

Hazardous Waste Connection

Compliance Information for Generators in Kansas

Spring/Summer 2003

Vol. 7, No. 1

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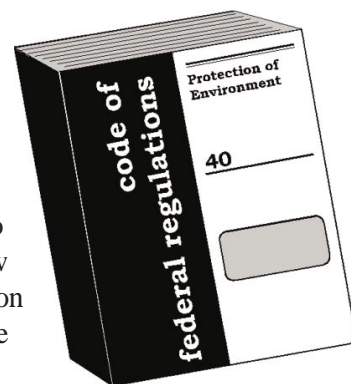
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Do I Generate Hazardous Waste?

by John Mitchell, Chief, Waste Compliance, Enforcement & Policy

Many business owners are stumped when asked which of their waste streams are hazardous. This confusion is apparent when a KDHE inspector shows up to conduct a compliance inspection as well as from the questions KDHE staff receive when it is time for hazardous waste generators to complete their annual reports. Determining which wastes are hazardous and which are not is not always simple. In our last issue, we began to explain the concept of waste determination and we will continue that theme in this edition. Wastes are hazardous either because of a characteristic they have or because they are on a list of known hazardous substances. These are identified in both state and federal regulations as either characteristic or listed hazardous waste. To determine if your business generates hazardous waste you need to know the following: what process generates the waste; the original composition of the waste material; and what substances are added in the process generating the waste.



A waste is a characteristic hazardous waste if it is ignitable (has a flashpoint of less than 140F); corrosive [has a pH of less than 2 (acidic) or above 12.5 (caustic)]; reactive (the waste is unstable, it reacts with water and forms an explosive mixture and may generate a toxic gas); or is toxic (based upon laboratory testing of a representative sample of the waste which indicates concentrations of specific contaminants exceed regulatory levels). To find out if a waste stream is a characteristic hazardous waste, first look at the Material Safety Data Sheet (MSDS) for the chemicals or products producing the waste. MSDS sheets are provided by product manufacturers. Check the "Fire and Explosion Hazard Data" to determine the flash point of the material then check the "Reactivity Data" to determine its stability. Check the "Physical Data" section for information on the pH of the material. Finally, look at the list of active ingredients and the "Health Hazard Data" for information on the toxicity of the ingredients and compare the ingredients to the list of chemicals in Appendix A of the KDHE Hazardous Waste Generator Handbook (available on the internet at www.kdhe.state.ks.us/waste/apps-hw/HW_Gen_Handbook_Aug_02.pdf or by calling 785- 296-1600 and requesting a free copy). Please note that MSDS formats vary so take time to read the information thoroughly. You may find the information you are looking for under a different heading.

A waste will be a listed hazardous waste if it is found on one of the lists in Appendix A in the Hazardous Waste Generator Handbook. Hazardous wastes found on the "F-list" are from non-specific sources which may have been generated by various industrial processes. The list is comprised of solvents commonly used as degreasers, paint removers, and paint thinners (as used in parts washers or cleaning paint guns), metal operations, and dioxin containing chemicals. Specific examples include benzene (F005), carbon tetrachloride (F001), cresylic acid (F004), methyl ethyl ketone (F005), methylene chloride (F001), 1,1,1, trichloroethane (F001), toluene (F005), and

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Kansas Department of Health &
Environment

Prepared and Distributed by
Bureau of Waste Management

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Reduce Hazardous Waste Generation and Reduce Your Liability

By Bill Bider, Director, Bureau of Waste Management

Wouldn't you like to be less regulated? In a world which seems to add to your regulatory burden each year, it is possible to make changes in your operations which decrease the number of rules which apply to your business. More specifically, by reducing your generation of hazardous waste, you will reduce overall company liabilities in many areas while potentially eliminating the applicability of certain regulations. At a minimum, less waste generation reduces the complexity of a company's hazardous waste management program. Reduced or eliminated rules always accompany any change in generator status, whether it is from an EPA generator to a Kansas generator, or from a Kansas generator to a small quantity generator. Some businesses may even be able to eliminate the applicability of all hazardous waste rules by totally eliminating all hazardous waste generation.

To effectively reduce hazardous waste generation, you need to first inventory all of your waste streams and thoroughly understand the processes which generate the wastes. Next you should prepare a waste minimization plan which systematically evaluates each waste stream to determine whether there is a process change or product change which can turn a hazardous waste into a non-hazardous waste. You may wish to target your largest waste streams first and progressively work your way down to smaller waste streams. To ensure progress, write things down. Do not just think about it.

The easiest way to reduce hazardous waste generation is to make product substitutions. Examples include: (1) shifting from solvent-based paints and thinners to water-based paints; (2) replacing listed parts cleaning solvents with petroleum or citrus-based cleaners; and (3) eliminating paints that contain heavy metals like lead or chromium. Numerous resources exist to help you identify reasonable product substitutions without sacrificing quality or performance. KDHE's Pollution Prevention Program can assist you in getting started in a good waste minimization program. They can be contacted at (785) 296-0669 or ccolglaz@kdhe.state.ks.us.

If you do reduce your waste generation and your generator class changes, you must submit a "Notification of Regulated Waste Activity" form to update your status. This form can be found in the Hazardous Waste Generator Handbook (available through our BWM web page - see front page article).

Make it your goal to decrease your hazardous waste generation this year and experience the benefits of reduced regulatory concerns, operating expenses, and personal stress.

Hazardous Waste Generator Workshops

KDHE will offer free workshops for hazardous waste generators at six locations throughout the state during the month of May. These meetings will focus on basic hazardous waste generator information, what is a hazardous waste, generator size classifications, generator regulatory requirements, compliance inspection procedures, and common violations. There also will be time to ask your specific questions. The same information will be presented during each workshop and while information will be presented about Small Quantity, Kansas, and EPA Generators, people whose businesses fall into the Small Quantity and Kansas generator classifications or those with little prior exposure to hazardous waste regulatory requirements will probably benefit most.

To ensure we have sufficient handouts, we would appreciate you pre-registering. You can pre-register for all workshop locations by calling 785-296-1600. If you wish, you may remain anonymous. Participation in the workshop can be used as part of the required training for hazardous waste trainers.

The workshop schedule follows:

May 8 - 1:30 - 4:30 pm	Johnson County Library, Antioch Branch 8700 Shawnee Mission Pkwy, Merriam, KS
May 8 - 6:00 - 9:00 pm	Johnson County Library, Antioch Branch 8700 Shawnee Mission Pkwy, Merriam, KS
May 14 - 1:30 - 4:30 pm	Sedgwick County Extension Educational Center 7001 West 21st Street North, Wichita, KS
May 14 - 6:00 - 9:00 pm	Sedgwick County Extension Educational Center 7001 West 21st Street North, Wichita, KS
May 15 - 1:30 - 4:30 pm	Neosho County Community College Room 209, Student Union 800 West 14th, Chanute, KS
May 20 - 6:00 - 9:00 pm	Bicentennial Center 800 The Midway, Salina, KS
May 21 - 6:00 - 9:00 pm	Ft. Hays State University Black and Gold Room, Memorial Union College Avenue, Hays, KS
May 28 - 6:00 - 9:00 pm	The Dodge House 2408 W. Wyatt Earp, Dodge City, KS
May 29 - 9:00 - 12:00 pm	The Dodge House 2408 W. Wyatt Earp, Dodge City, KS



If you could get information that would save your company money, help your company comply with RCRA regulations, and save you stress, worry, and time next time a KDHE inspector comes calling, would you take advantage of it? What if it was offered for free? Help is at your fingertips with KDHE's policies, technical guidance documents, and checklists found on the Bureau of Waste Management's website: <http://www.kdhe.state.ks.us/waste/index.html>

For hazardous waste generators, a popular page to begin your journey on is located at http://www.kdhe.state.ks.us/waste/bwm_haz_waste_gen.html This page contains a brief history of the RCRA program and links to everything from the Notification of Regulated (Hazardous Waste) Activity Form to the Kansas Hazardous Waste Statutes and Regulations. While you're there, be sure to download a copy of the Hazardous Waste Generator Handbook. It contains much of the information you read about in this newsletter.

Do you ever wish you could be better prepared for a KDHE inspection? Now you can know the questions the inspector will ask you before they ever walk in your door. The same inspection checklists the inspectors use are in the process of being posted on our website at http://www.kdhe.state.ks.us/waste/bwm_haz_waste_insp_forms.html Be sure to check this page often as more of our checklists are posted.

The hazardous waste regulations can sometimes be very confusing. KDHE recognizes this and publishes many Technical Guidance Documents. These documents clarify and help you better understand KDHE's intent and regulatory position on these issues. The topics covered are diverse, ranging from medical waste and photographic film to recycling and disposal of aerosol cans. A complete listing of the Technical Guidance Documents, with links to each, can be found at http://www.kdhe.state.ks.us/waste/bwm_tech_guide.html

As your time and budget becomes more stretched, it is important to use every means available to manage your company's environmental compliance in an efficient manner. Utilizing the power of the internet, KDHE can help you do just that.

Do I Generate Hazardous Waste?

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trichloroethylene(F001). Solvent mixtures or blends which contain greater than ten percent of one or more of the solvents listed as F001, F002, F003, F004, and F005 are also considered F-listed wastes.

The "K-listed" wastes are generated from specific industrial processes such as wood preservation, inorganic pigment production, chemical and pesticide production, explosives manufacturing, petroleum refining, and the production and refining of metals.

The "P-listed" and "U-listed" hazardous wastes include discarded commercial chemical products, off-specification chemicals, residues left in containers, and residues from spillage of materials. The chemicals on the P-list are acutely toxic and regulated in small quantities. Businesses that generate P and U-listed wastes include pesticide applicators, private and school laboratories, and chemical manufacturers and formulators.

Before determining whether your business generates hazardous waste, check the list of exempted wastes found on Table 2 of the Hazardous Waste Generator Handbook. These wastes are exempt from hazardous waste regulations but must still be managed in an environmentally sound manner.

It is a good business practice to develop an inventory of all wastes generated by your business, demonstrating sound management of both solid and hazardous wastes. This will assist you in determining your generator category and in properly disposing of all of your wastes in a timely manner.

In conclusion, use the following process in determining if your waste is hazardous:

1. Check the waste against the list of exempted wastes found in Table 2;
2. Check the waste against the four hazardous waste lists (F, K, P, and U);
3. Determine through laboratory testing or knowledge of the process generating the waste whether the waste is a characteristic hazardous waste.

If you determine your waste is hazardous then you are subject to the management requirements corresponding to your generator classification (also addressed in the Hazardous Waste Generator Handbook). Regardless whether your waste is hazardous or not, please consider any recycling options which may be available and always remember to manage your wastes appropriately.

By accurately defining the waste streams your facility generates, you are well on your way to responsible environmental management. In the next issue, we will discuss the options available to generators for disposal and management of hazardous waste.

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Upcoming Events

- May, 2003

Hazardous Waste Generator Workshops
Free workshops for hazardous waste generators at six locations throughout the state during the month of May. See article on page 2 for more information.
- August 26-27, 2003

Kansas Environmental Conference
Annual environmental conference for business, industries, communities, consultants, and other interested in the Kansas Environment.
Marriott Hotel, Wichita, KS Call Cathy at 785-296-0669 for information

 Important Hazardous Waste (HW) Program Phone Numbers

KDHE - Bureau of Waste Management			KDHE - District Office Inspectors	
Director	Bill Bider.....	785/296-1612	Northeast - Lawrence	785/842-4600
EPA ID numbers	Jeannie McCorkle.....	785/296-6898	Southeast - Chanute	620/431-2390
HW Complaints	Lynda Ramsey	785/296-0681	North Central - Salina	785/827-9639
HW Reg Info	George McCaskill.....	785/296-1606	South Central - Wichita	316/337-6020
HW Generator Info	John Mitchell.....	785/296-1608	Northwest - Hays	785/625-5663
HW Transporter Info	Linda Prockish.....	785/296-0005	Southwest - Dodge City.....	620/225-0596
Newsletter Contact	John Mitchell.....	785/296-1608	KSU Pollution Prevention	785/532-6501
			or toll free for long distance	800/578-8898